IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA WESTERN DIVISION

Howard J. Miller, et al.) Civil Action No. 1:20-cv-00132)
Plaintiffs,)))
v.)
Juárez Cartel, a/k/a Vicente Carrillo Fuentes Organization (a/k/a "CFO"), a/k/a La Línea.))))
Defendants.)

MOTION FOR CONSOLIDATION

Pursuant to F.R.Civ.P. 42(a), Howard Miller, et al., hereby move the Court for an order consolidating *Langford et al. v. Juarez Cartel, et al.*, Case No. 1:20-cv-00159 into *Miller, et al. v. Juárez Cartel, et al.*, Civ. Action No. 1:20-cv-00159. These two actions involve common questions of law and fact, and consolidation is appropriate in order to limit the burdens of the litigants and in order to promote judicial economy. The complaints have not yet been served and the parties consent to this consolidation.

Pursuant to D.N.D. Civ. L.R. 7.1, this motion is supported by the accompanying memorandum, and all other documents of record in the two actions.

Dated this 21st day of September 2020.

Respectfully Submitted,

By: /s/ Michael Elsner

MOTLEY RICE LLC

Michael Elsner, Esq.
John Eubanks, Esq.
Courtney Wolf, Esq.
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, South Carolina 29465
Telephone: (843) 216-9000

MITCHELL & MITCHELL LLC

Samuel F. Mitchell, Esq. Steven C. Mitchell, Esq. 7161 E. Rancho Vista Dr. Scottsdale, AZ 85251

O'KEEFE O'BRIEN LYSON FOSS ATTORNEYS

Tatum O'Brien, Esq. 720 Main Avenue Fargo, ND 58103 Telephone: 701-235-8000